

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

IN RE: LOESTRIN 24 FE ANTITRUST
LITIGATION

THIS DOCUMENT RELATES TO:
All End-Payor Plaintiff Actions

MDL No. 2472

Master File No. 1:13-md-2472-WES-PAS

**STIPULATION AND [PROPOSED] ORDER REGARDING END-PAYOR
PLAINTIFFS' WASHINGTON AND WYOMING UNJUST ENRICHMENT CLAIMS
UNDER STATE LAW**

WHEREAS, in its Memorandum of Decision on Class Certification and Order Regarding Motions to Exclude Certain Expert Opinions and Defendants' Renewed Motion to Dismiss (Oct. 17, 2019), ECF No. 1274 ("Order"), this Court dismissed certain of the End-Payor Plaintiffs' ("EPPs") unjust enrichment claims;

WHEREAS, Defendants and EPPs have met and conferred and agree that the Court's reasoning also applies to EPPs' unjust-enrichment claims under the laws of Washington and Wyoming; and

WHEREAS, EPPs preserve all rights to challenge the Court's ruling on appeal.

NOW, THEREFORE, it is hereby stipulated by and between the undersigned parties through their respective counsel, as follows:

1. The EPPs' unjust enrichment claims under the state laws of Washington and Wyoming are hereby dismissed with prejudice.
2. Nothing in this stipulation and order shall be construed as a waiver of EPPs' right to contest this Court's ruling with respect to EPPs' unjust-enrichment claims, including their claims under the laws of Washington and Wyoming.

The Parties respectfully request that the Court enter an order embodying the terms of their joint stipulation.

Dated: December 18, 2019

Respectfully submitted,

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SO ORDERED

CERTIFICATE OF SERVICE

I, Nicole J. Benjamin, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's CM/ECF system. Those attorneys who are registered CM/ECF users may access these filings, and notice of these filings will be sent to those parties by operation of the CM/ECF system.

Dated: December 18, 2019

/s/ Nicole J. Benjamin
Nicole J. Benjamin